

UNITED STATES DISTRICT COURT  
for the  
\_\_\_\_\_ District of \_\_\_\_\_

United States of America )  
v. )  
 ) Case No.  
 )  
 )  
 )  
 )  
 )

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of \_\_\_\_\_ in the county of \_\_\_\_\_ in the  
District of \_\_\_\_\_, the defendant(s) violated:

### *Code Section*

### *Description of Offenses*

This criminal complaint is based on these facts:

Continued on the attached sheet.

*Complainant's signature*

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Date:

*Judge's signature*

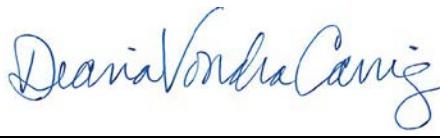
City and state:

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*Printed name and title*

## **CONTENTS APPROVED**

## **UNITED STATES ATTORNEY**

  
By: \_\_\_\_\_  
DIANA VONDRA CARRIG  
Assistant U.S. Attorney

Date: \_\_\_\_\_ August 10, 2020 \_\_\_\_\_

**ATTACHMENT A**

**(18 U.S.C. § 1958(a) – Murder-for-Hire)**

From in or around May 8, 2016 through in or around May 20, 2016, in Atlantic County in the District of New Jersey, and elsewhere, defendant

JOHN MICHAEL MUSBACH

did knowingly and intentionally use and cause another to use any facility of interstate and foreign commerce, that is, the internet, with the intent that a murder be committed, in violation of the laws of the State of New York, that is, New York Penal Law § 125.25 (murder in the second degree), and as consideration for the receipt of anything of pecuniary value, that is, approximately 40 Bitcoin which then had a value of approximately \$20,000 in United States currency.

In violation of Title 18, United States Code, Sections 1958(a).

## **ATTACHMENT B**

George Lance Herbert, after being duly sworn, deposes and says as follows:

1. I, George Lance Herbert, am a Special Agent with Homeland Security Investigations (“HSI”), an agency of the United States Department of Homeland Security (“DHS”), and have been so employed since 2009. I am currently assigned to the Special Agent in Charge Field Office in Newark, New Jersey.

2. My current duties include investigating cybercrimes on the clear web and dark web, including, but not limited to, narcotics crimes, weapons trafficking, human trafficking, child exploitation, kidnapping, murder for hire, and financial crimes.

### **A. Basis of Information.**

3. This affidavit is based upon my personal knowledge; my review of documents and other evidence; my conversations with other law enforcement personnel and witnesses; and my training, experience and advice received concerning the use of computers in criminal activity and the forensic analysis of electronically stored information (“ESI”). Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during my investigation. The statements contained in this affidavit are reported in substance and in part unless otherwise indicated.

### **B. The Subject Offense—18 U.S.C. § 1958(a).**

4. For the reasons detailed below, I submit there is probable cause to believe that defendant JOHN MICHAEL MUSBACH (“MUSBACH”) committed a violation of Title 18, United States Code, § 1958(a), which criminalizes the use of interstate commerce facilities in the commission of murder-for-hire, and provides as follows:

(a) Whoever travels in or causes another (including the intended victim) to travel in interstate or foreign commerce, or uses or causes another (including the intended victim) to use the mail or any facility of interstate or foreign commerce, with intent that a murder be committed in violation of the laws of any State or the United States as consideration for the receipt of, or as consideration for a promise or agreement to pay, anything of pecuniary value, or who conspires to do so [is guilty of a crime.]

### **C. Terminology.**

5. Based on my training, research, education, and experience, I am familiar with the following relevant terms:

(a) The “dark web,” also sometimes called the “dark net” or “deep web,” is a colloquial name for a number of extensive, sophisticated, and widely used criminal marketplaces operating on the Internet, which allow participants to buy and sell illegal items and services, such as drugs, firearms, assault/murder, and other hazardous materials with greater anonymity than is possible on the traditional Internet (sometimes called the “clear web” or simply “web”). These online black-market websites use a variety of technologies, including the Tor network (defined below) and other encryption technologies, to ensure that communications and transactions are shielded from interception and monitoring. A famous dark web marketplace, Silk Road, operated similar to legitimate commercial websites such as Amazon and eBay, but offered illicit goods and services. Law enforcement shut down Silk Road in 2013. More recently active dark web markets include AlphaBay and HANSA.

(b) “Vendors” are the dark web’s sellers of goods and services, often of an illicit nature, and they do so through the creation and operation of “vendor accounts.” Customers, meanwhile, operate “customer accounts.” It is possible for the same person to operate one or more customer accounts and one or more vendor accounts at the same time.

(c) Internet Relay Chat (“IRC”) is a method of communication, which allows its users to send and receive live, synchronous messages. There are thousands of IRC channels around the world, hosted on servers, on which people type text-like messages to others on the same channel who are interested in the same subject.

### **D. MUSBACH Engaged in an Online Relationship with a 13-Year Old.**

6. In or about the summer of 2015, MUSBACH began conversing via the IRC cloud website with a then 13-year old (the “Victim”). At some point, those IRC conversations turned sexual, and MUSBACH and the Victim exchanged sexually explicit videos and photographs of themselves, including videos of themselves masturbating.

7. In or about September 2015, the Victim's parents discovered the online relationship between MUSBACH and the Victim and notified their local law enforcement officers in the State of New York where the Victim resided. Officers then began investigating MUSBACH's conduct.

8. In or about September, 2015, the Victim notified MUSBACH that his parents had called the police. Shortly thereafter, a New York law enforcement officer also contacted MUSBACH and told MUSBACH to stay away from the Victim. According to New York law enforcement records, by September 17, 2015, MUSBACH had knowledge that he was under investigation for his online sexual contact with the Victim.

9. As the investigation proceeded, New York law enforcement officers learned that MUSBACH was then residing in Atlantic County, New Jersey, and reached out to the Atlantic County Prosecutor's Office ("ACPO") who continued the investigation.

10. On or about March 31, 2016, officers from the ACPO arrested MUSBACH on child pornography charges and executed a search warrant at MUSBACH's then-residence, 802 Blue Teal Drive, Galloway, New Jersey. During the search, law enforcement officers seized MUSBACH's cellular telephone and also his business laptop provided to him by his then-employer, a cloud hosting company (hereinafter referred to as "MUSBACH's former employer"). After receiving and waiving his Miranda warnings, MUSBACH admitted to having sent sexually explicit images and videos of himself to the Victim and having requested and received sexually explicit images and videos from the Victim, all while knowing that the Victim was 13-years old.

11. On or about October 11, 2017, MUSBACH pleaded guilty to endangering the welfare of a child (the Victim) by sexual contact in violation of N.J. Stat. Ann. § 2C:24-4A(1). On February 9, 2018, a New Jersey Superior Court Judge sentenced MUSBACH to a two-year suspended sentence with parole supervision for life.

**E. Homeland Security Investigations, Newark, New Jersey, Received Information that an Individual Known as “agentisai” Attempted to Hire a Hitman.**

12. In or about January, 2019, an individual (hereinafter referred to as “SOURCE”)<sup>1</sup> provided information to federal law enforcement agents pertaining to a murder-for-hire website which operated on the dark net (hereinafter referred to as “WEBSITE”)<sup>2</sup> which purported to offer contract killings or other acts of violence in return for payment in cryptocurrency.

13. The WEBSITE’s homepage advertised the following:

“If you want to kill someone, or to beat the shit out of him, we are the right guys. We have professional hitmen available throughout the entire USA, Canada and Europe and you can hire a contract killer easily. Most of our gang members are drug dealers but they do contract killing when they are short on cash. No undercover cops here. No risks of getting caught, because we are professional killers: We don’t ask you for your name, we don’t want to know who you are or where you live... You pay in Bitcoin to escrow, and money is held in escrow until job is done.”

14. The SOURCE provided agents with some of the private communications between the WEBSITE administrators and those seeking its services – explaining that the SOURCE had had “scraped” the data from the WEBSITE by “hacking” the WEBSITE. That information included communications between WEBSITE administrators and an individual using the screenname “agentisai,” who was later determined to be defendant MUSBACH.

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<sup>1</sup> Based upon this investigation and others in which the SOURCE has provided information which has been corroborated by independent evidence, I believe the Source to be a reliable and credible source of information.

<sup>2</sup> The actual name of WEBSITE is known to law enforcement. The site remains involved in several other investigations and disclosure of the name of the site would potentially alert individuals to the fact that law enforcement action is being taken against the site and other users of the site. Accordingly, for purposes of the confidentiality and integrity of ongoing investigations, specific names and other identifying factors have been replaced with generic terms.

15. Specifically, the Source provided the following private messages between the Administrator (“Admin”) of the WEBSITE and the person using the screenname agentisai:

| # | DATE & TIME          | SENDER    | MESSAGE  |
|---|----------------------|-----------|--|
|   | 12/26/15<br>23:51:27 |           | ** Date user, agentisai, signed up **  |
| 1 | 5/7/16<br>20:05:00   | agentisai | Hey there,<br>I am in south NJ and need a handgun with ammo because I lack the ability to obtain one myself legally. How would getting this work and how much would it cost?   |
| 2 | 5/8/16<br>20:05:00   | Admin     | Hello agentisai,<br>We received your message.<br>We usually reply within a few hours . . .<br>If you have any more questions or need any information please reply to this message.<br>Thank you<br>Yura CyberTeam admin . . .  |
| 3 | 5/8/16<br>18:43:00   | agentisai | Alternatively to a gun order, I could place a hit order. However, the target would be 14. <sup>3</sup> Is that an acceptable age or too young? I can budget up to \$20k for the order.   |
| 4 | 5/8/16<br>21:54:00   | Admin     | Hello,<br>Yes, 14 years old is acceptable.<br>We have gang members to do the hit; however the price is about 18500.<br>This should be in your budget, please add order using the order page and add 40 bitcoin to your account<br>The bitcoin will remain into your account until the job is done<br>Let me know |
| 5 | 5/9/16<br>03:54:00   | agentisai | Ok I will get the bitcoin tomorrow the 9th and let you know once it's there and the order placed.  |
| 6 | 05/10/16<br>06:49:00 | Admin     | Hi,<br>Ok,<br>If you need any help or assistance let me know   |

<sup>3</sup>Although the Victim was 13 years old when the underlying child pornography conduct occurred, the Victim turned 14 years old during the pendency of the investigation and was 14 years old in May 2016.

|    |                      |           |  |
|----|----------------------|-----------|--|
| 7  | 5/10/16<br>06:49:00  | agentisai | Ok will do thanks. I got half of it in my wallet now:<br><a href="https://blockchain.info/address/1BMN3CuwtJHfcNCG2z5iL72RwU18aZadC">https://blockchain.info/address/1BMN3CuwtJHfcNCG2z5iL72RwU18aZadC</a><br>But my Coinbase purchase limit is \$10,000 so I have to wait until tomorrow to finish. Will let you know once that's done.   |
| 8  | 05/11/16<br>00:43:00 | Admin     | Hello,<br>Ok. Please notice that all incoming bitcoins to our customer wallets are mixed through our bitcoin mixer; because of this you might notice a short delay of a few minutes up to a few hours for the bitcoin to show up in your account balance.<br>let me know when done.  |
| 9  | 5/11/16<br>20:41:00  | agentisai | Hello,<br>I have transferred the remaining btc to the wallet. Once the balance shows up here, I will place an order with all the details.  |
| 10 | 5/11/16<br>23:54:00  | Admin     | Hello,<br>We received your new order information.<br>Please add Bitcoin to your personal Wallet on your account and we will assign a hitman to your job.<br>If you have any questions or need any information please reply to this message.<br>Please login daily to your account on [WEBSITE], to view replies from us and updates on your job,<br>Looking forward to hear from you<br>Yura CyberTeam admin . . . |
| 11 | 5/11/16<br>23:57:00  | Admin     | Hello,<br>Ok. The bitcoin should be visible in your wallet shortly<br>please place your order and let me know  |
| 12 | 5/11/16<br>23:58:00  | agentisai | Ok I placed the order. Thanks.   |
| 13 | 5/12/16<br>00:4:00   | Admin     | Hello,<br>We received the order. I have assigned a hitman on the job and he got the info.<br>We will keep you posted in the next days, and we will tell you as soon as is done, and provide proof<br>let me know   |
| 14 | 05/12/16<br>00:10:00 | agentisai | Ok sounds good.  |
| 15 | 5/14/16              | agentisai | Hello,   |

|    |                     |           |   |
|----|---------------------|-----------|---|
|    | 01:02:00            |           | Just wondering if a day has been picked?<br>Thanks.   |
| 16 | 5/17/16<br>11:43:00 | agentisai | Hello,<br>A little worried I haven't heard anything. There's three days left.<br>Please keep me posted on how things are going and do the job within<br>the next three days. If it's not possible, please let me know and I will<br>withdraw the bitcoin.<br>Thanks.  |
| 17 | 5/18/16<br>00:24:00 | Admin     | Hello,<br>Yes, the day has been picked.<br>The hitman is there to do the job, I will keep you posted soon   |
| 18 | 5/18/16<br>12:55:00 | agentisai | Great, sounds good thanks. I look forward to the update.  |
| 19 | 5/19/16<br>19:50:00 | Admin     | Hi,<br>There is a small problem; the assigned hitman got arrested for cocaine<br>possession while he was near the place.<br>We have an other hitman ready to do the hit, but he saith this is an<br>important person and he asks for an difference of \$5000<br>Can you get the difference exchanged to bitcoin and deposited to your<br>account, for the new hitman to do your job? He is better than the one<br>who got arrested for cocaine; he can do it tomorrow on 20 05<br>If not, as soon as the assigned hitman is out, he will do the job. He<br>won't be long, as his cocaine possession was not a large quantity<br>let me know |
| 20 | 5/19/16<br>20:03:00 | agentisai | Hello,<br>Bummer. :( I can get the \$5,000 extra but there is a \$1,000 daily bank<br>account purchase limit. Can the other guy do the hit tomorrow, I will<br>give him the 40.64 BTC then and follow it up with the remainder<br>once I get it transferred? I can provide a screenshot of the money in<br>the bank account if need be.   |
| 21 | 5/19/16<br>20:06:00 | agentisai | Hello,<br>Actually, I can do the same thing I did previously which is wire<br>money to coinbase tomorrow and then on Monday I will be able to<br>convert the extra \$5,000 and transfer it to here. Would the hitman be<br>willing to perform the hit tomorrow for the 40.64 and remainder on<br>Monday? Again, I can provide a screenshot of the account balance if<br>need be, But that's as fast as I can get the extra money I'm afraid.<br>Thanks.   |
| 22 | 5/19/16             | Admin     | Hi,   |

|    |                     |           |  |
|----|---------------------|-----------|--|
|    | 21:23:00            |           | <p>I asked the hitman, he saith he can do the job once I confirm the amount is in your personal balance; he is afraid that you might not send the additional bitcoin after the hit is done, and since you are anonymous, he could not be able to track you down to get it. Maybe you can cash the money out and exchange bitcoin for cash; on sites like localbitcoins.com ?</p> <p>There are many traders who can trade bitcoin for cash</p> <p>Let me know</p>   |
| 23 | 5/19/16<br>21:43:00 | agentisai | <p>Hello,</p> <p>To confirm, if I get the \$5,000 BTC tonight he can do the hit tomorrow?</p> <p>Thanks.</p>   |
| 24 | 5/19/16<br>23:08:00 | agentisai | <p>Hello,</p> <p>I'm afraid I cannot find any source of bitcoin this short notice. I have checked localbitcoins.com, and while there are people who will sell there, they are all offline for the day. I also found a potential website that may give me a quick turn around on the coins, but they too are closed for the day. I think that up to this point I have been very honest and shown that I do have the money I say I do and deposit it as soon as I can. However, Bitcoin is a bit difficult to obtain and transfer short notice. I'd really like for this transaction to end on a positive note, and I have a vested interest in this being a success. To that end, I completely intend to do all I can to ensure I have the \$5,000 in bitcoin by end of Monday if not tomorrow. However, given the variables at play I cannot guarantee that I will have the Bitcoin by tomorrow despite my best efforts.</p> <p>I understand the concern of me not paying, although that is absolutely not my intention. When I originally came here, my first inquiry was for a gun which would've involved some sort of personal information being provided I imagine. As such, to complete the job tomorrow, as collateral would it be acceptable for me to provide my name and address so that were I to walk off with the money I could be tracked and/or hit myself?</p> <p>I absolutely will do everything to get the \$5,000 by end of Monday. But I'd still like this job to be completed within the timeframe originally agreed on. As such, can you please let me know if the collateral previously mentioned will be acceptable in return for the job being completed tomorrow? If it is not, I suppose I will cancel the job and withdraw what bitcoin is currently here. But, I'd much rather have the job done and everyone paid and happy just as soon as is</p> |

|    |                      |           |  |
|----|----------------------|-----------|--|
|    |                      |           | possible.<br>Thanks and sorry for the long reply.  |
| 25 | 5/20/16<br>01:27:00  | agentisai | Hello,<br>Imay be able to get the bitcoin afterall in time for the hit tomorrow afternoon. Is there a cutoff?"<br>Thanks.  |
| 26 | 5/20/16<br>08:20:00  | agentisai | Hello,<br>Sorry, last update...My localbitcoins.com contact fell through. Will my suggestion of providing name and address as collateral while I get bitcoin via coinbase by end of Monday work in exchange for the hit taking place today (Friday) or should we just cancel this hit and I'll withdraw the 40.64 bitcoin?<br>Thanks.  |
| 27 | 5/20/16<br>16:01:00  | agentisai | Hello,<br>I'm afraid that this won't work out given the circumstances. I've tried submitting the withdraw form but haven't seen anything specific happen. Can you please cancel the hit and send the 40.64 BTC to 1D1tDDFtbhqeYqVXaaxxUSjqmHenTBZdbU?<br>Thanks.   |
| 28 | 5/20/16<br>18:35:00  | Admin     | Hello,<br>You sent a lot of messages in a short time, and we are going through several improvements and updates on the website, this is why the withdraw option was not working.<br>It will be working soon, when we finish the update<br>Regarding cancelation, sure, we can cancel and send you the bitcoins. However, if you have a other date when our hitman can do the hit, we would be happy to do it, even if the kid travels to a different location we can assign a different hitman there, to find him<br>Let me know |
| 29 | 5/20/16<br>18:38:00  | agentisai | Hello,<br>Sorry things didn't work out. Thanks for the offer of trying some other time but I think I'm done for now. Please send the 40.64 BTC to 1D1tDDFtbhqeYqVXaaxxUSjqmHenTBZdbU.<br>Thanks.   |
| 30 | 05/20/16<br>19:33:00 | Admin     | Hi,<br>I am sorry to disappoint you.<br>Unfortunattely, our site is a scam, and we pass customer and target information to law enforcement.  |

|    |                      |           |   |
|----|----------------------|-----------|---|
|    |                      |           | <p>We are able to dox the customers ( find out who they are ) by expert IP and proxy analysis and as our site uses javascript to extract personal information from the user computer.</p> <p>The 40 Bitcoins are lost, if you want to avoid us give your info and target info to law enforcement, please send us 20 Bitcoin – 10 000\$ to the same address as before.</p> <p>Once we receive the additional money, we will delete your account, all messages, and all information about you and the target.</p> <p>If you don't send the additional money, we will send all information to law enforcement and you might be arrested, ordering murder and paying for murder can get you in jail for a long time</p> <p>please do not post anything about us blackmailing you anywhere, if you do, we will immediately send your information to law enforcement</p> <p>let me know</p> |
| 31 | 05/20/16<br>19:40:00 | agentisai | <p>Hello,</p> <p>Is this a joke? Please just send my BTC back.</p> <p>Thanks.</p>   |
| 32 | 5/20/16<br>19:59:00  | Admin     | <p>Hi,</p> <p>No, this is not a joke. The [WEBSITE] has been hacked. We the hackers have full control over it, we infected it with malware and javascript and extracted everything from your computer.</p> <p>We have proofs that you ordered the murder, who you are, who the target is, and proof that you paid for it, you will be arrested unless you send us 22 bitcoin to this address</p> <p>15guigVQg1SnZW2stqnK5cazTbU4aZLKo3</p> <p>You have 4 days to do it, or your info is to police and you get 10 years in jail</p> <p>just search youtube for hiring hitmen arrested to see people arrested for hiring hitmen</p>   |
| 33 | 5/20/16<br>20:03:00  | agentisai | <p>Hello,</p> <p>Can you please provide me with the information you have on who I am?</p> <p>Thanks.</p>  |
| 34 | 5/20/16<br>20:21:00  | agentisai | <p>Hello,</p> <p>I am a little confused as to where any javascript or malware comes into play here. When looking at the dev console, I see absolutely no requests for anything besides images. Again, if you can provide the information you have on me I'd be glad to pay you the BTC you are asking for.</p>  |

|    |                     |       | Thanks.  |
|----|---------------------|-------|--|
| 35 | 5/20/16<br>20:22:00 | Admin | <p>Hello,</p> <p>We will not provide any information to you, because we don't know if you are the customer or not. The site suffered multiple hacking attempts, and you might not be the customer, you might be someone else logged in as him.</p> <p>If you are the customer, you will have to gamble on this.</p> <p>Either be safe, send us 22 bitcoin and we delete your account and everything, or you can gamble and let us send the info to the cops, including your details, the target, and the blockchain transactions this should be enough to get you arrested and in jail</p>   |
| 36 | 5/20/16<br>20:43:00 | Admin | <p>I am not going to go into specific details with you or technical things. It will be your call. Risk it or play it safe.</p> <p>Hope you purchased your bitcoins with care. The transactions on blockchain can be traced back to your original account as well, that has your full name and info on it.</p> <p>That along, with all your info on there, with the bitcoin transactions, and with the info here on [WEBSITE] and target info can get you arrested</p> <p>If the kid is a child of some influent person, you will be in jail long time</p> <p>Just sent the money and we delete all account and everything</p> <p>Let me know</p> |

**F. Subsequent Investigation Revealed that “agentisai” is JOHN MICHAEL MUSBACH.**

16. As described more fully below, by investigating the source of the monies, HSI agents were able to link MUSBACH to the “agentisai” account.

17. After receiving the information from the Source, HSI agents subpoenaed Coinbase, the virtual currency exchanger, for information pertaining to the Bitcoin wallet (1BMN3CuwtJHfcNCG2z5iL72RwU18aZadC) into which agentisai allegedly deposited approximately \$10,000 on May 10, 2016 (as discussed in the May 10, 2016 communication from agentisai, *see ¶ 15 at entry 7*).

18. In response to the subpoena, Coinbase provided information and records showing that the Bitcoin wallet (1BMN3CuwtJHfcNCG2z5iL72RwU18aZadC) was affiliated with a Coinbase

account having a user id 572ffc99298d8727e400017e, which had been opened on May 8, 2016 by and individual who identified himself as “John Musbach,” and provided the following identifying information:

- Date of Birth XX/XX/1989;
- Social Security Number XX-XXX-5981;
- New Jersey Driver’s License Number MXXX XXXXX X4895;
- Bank of America Savings Account Number XXXXXX0897;
- 802 Blue Teal Drive, Galloway, New Jersey; and
- Email account [musbachjohn@gmail.com](mailto:musbachjohn@gmail.com).

19. Based upon reviews of law enforcement data bases and reviews of other records provided in this investigation, I am aware that defendant MUSBACH has the same personal identifiers as the individual who opened the Coinbase account.

20. In addition, Coinbase also provided a copy of a driver’s license it received from the individual who opened the account. That driver’s license was issued in the name of the defendant, that is, “John M. Musbach,” and contained a photograph of the person I know to be MUSBACH, along with other identifying information, including MUSBACH’s date of birth, driver’s license number and an address affiliated with MUSBACH in Absecon, New Jersey. Accordingly, I have identified MUSBACH as the owner of that Coinbase account (hereinafter referred to as “MUSBACH’s Coinbase account”).

21. Coinbase also provided the following information:

- a. The user of MUSBACH’s Coinbase account sent 40.64 bitcoins to the bitcoin wallet 1BMN3CuwtJHfcNCG2z5iL72RwU18aZadC.
  - This is the wallet affiliated with the WEBSITE as referenced in the May 10, 2016 message from agentisai (*see ¶ 15, at entry 7*).
- b. Bitcoin wallet 1D1tDDFtbhqeYqVXaaxxUSjqmHenTBZdbU belonged to MUSBACH’s Coinbase account.
  - This is the wallet that agentisai provided to the WEBSITE Admin on May 20, 2016, when attempting to obtain a refund of the monies paid for the hit (*see ¶ 15, at entries 27 & 29*).

- c. The last activity by the user of MUSBACH's Coinbase account was on May 24, 2016 when the user deleted his email account, [musbachjohn@gmail.com](mailto:musbachjohn@gmail.com).

22. Following up on the information received from Coinbase, HSI Agents served a subpoena to Bank of America ("BOA") for information pertaining to the bank account referenced in the Coinbase subpoena response, BOA Account XXXXXX0897. Records from BOA showed that:

- a. \$20,040.00 was wired from the 0897 BOA Account to MUSBACH's Coinbase account on May 9, 2016; and
- b. The 0897 BOA Account is registered to John MUSBACH, at 802 Blue Teal Drive, Galloway, New Jersey.

23. As described more fully below, based upon the search warrant executed by the ACPO on March 31, 2016 (see ¶ 10 above), I am aware that defendant MUSBACH lived at 802 Teal Drive, Galloway, New Jersey in 2016.

24. In or about October, 2019, HSI agents obtained a hard drive from the ACPO containing a forensic image of the electronic evidence seized from the search of MUSBACH's residence. An examination of that hard drive revealed the following information linking defendant MUSBACH to the "agentisai" username:

- a. An invoice for Icloud service provided by MUSBACH's former employer addressed to John Musbach at [johnmusbach1@gmail.com](mailto:johnmusbach1@gmail.com), which listed several user accounts, including "johnmusbach," "johnmusbach1," "agentisai," "agent\_isai," and "is-ai;"
- b. Numerous google searches for "agent\_isai irc;"
- c. Twitter searches for "Agent\_Isai;"
- d. Facebook searches for "Isainode;" and
- e. The below listed Google searches, which began in or about September 2015, shortly after New York law enforcement officers notified MUSBACH that they were investigating him for his involvement with a then-13-year-old Victim:

| Date                       | Google Searches Found in MUSBACH's Browsing History     |
|----------------------------|---|
| September 27, 2015         | Child grooming law                                      |
| September 27, 2015         | Child grooming nys                                      |
| November 11, 2015          | How are you notified of an indictment                   |
| November 14, 2015          | Do gun shows take credit cards                          |
| December 23, 2015          | nj sex offender search                                  |
| December 24, 2015          | Not guilty by reason of insanity                        |
| December 25, 2015          | Death by chloroform                                     |
| December 25, 2015          | Where to buy chloroform                                 |
| December 25, 2015          | Chemical that passes you out                            |
| January 1, 2016            | Nj gun shows  |
| January 8, 2016            | Nys restraining order search                            |
| January 11, 2016           | Get information on investigations                       |
| January 16, 2016           | Is it legal to buy a gun                                |
| January 26, 2016           | Is calcium chloride toxic                               |
| February 1, 2016           | Pa gun show   |
| February 3, 2016           | Death by caffeine                                       |
| February 5, 2016           | Poisonous hemlock                                       |
| February 5, 2016           | Poisonous plant   |
| February 5, 2016           | Kill all jews   |
| February 5, 2016           | Full erase macbook                                      |
| March 5, 2016              | Flouride poisoning                                      |
| March 13, 2016             | 1 btc to USD  |
| March 15, 2016             | Coinbase  |
| March 27, 2016             | Look up restraining order NYS                           |
| March 27, 2016             | NYS are you notified of a restraining order against you |
| Unable to recover the date | How to buy a gun in NJ                                  |
| Unable to recover the date | KKK website   |
| Unable to recover the date | Settings_clear_browsing_data                            |

25. In or about March 2020, HSI served a subpoena to MUSBACH's former employer. MUSBACH's former employer's subpoena response revealed that Musbach created the following user accounts while working for MUSBACH's former employer, each of which was associated with a different email address:

- (a) Johnmusbach created on 9/7/14 with associated email, [jmusbach@\[MUSBACH's former employer\].com](mailto:jmusbach@[MUSBACH's former employer].com);
- (b) agent\_isai created on 11/8/15 with associated email [webmaster@isainode.net](mailto:webmaster@isainode.net);
- (c) agentisai created on 11/26/15 with associated email [isaicastro99@yahoo.com](mailto:isaicastro99@yahoo.com); and
- (d) is-ai created on 1/16/16 with associated email [agentisai@gmail.com](mailto:agentisai@gmail.com).

26. Pursuant to New York Penal Law § 125.25: “[a] person is guilty of murder in the second degree when . . . [w]ith the intent to cause the death of another person, he causes the death of such person or of a third person.”

## **G. Conclusion.**

27. Based upon the investigation, I have probable cause to believe that from the time period from on or about May 8, 2016 through May 20, 2016, defendant MUSBACH communicated with a person or persons he believed ran a murder for hire website and ordered and paid for a “hit” on a Victim who was then, a 14-year old child. As explained above, at the time MUSBACH contracted for the murder of Victim, MUSBACH knew he was under investigation for exchanging sexually explicit images with Victim. An examination of MUSBACH’s computer, revealed several internet searches establishing MUSBACH’s intent to injure or kill an individual and also to cover-up these actions. The communications between agentisai and the WEBSITE administrators make it clear that agentisai paid approximately \$20,000.00 (40.64 bitcoins) in an attempt to hire a hitman to kill a then-14-year old child. The subsequent investigation positively identified “agentisai” as the defendant John MUSBACH. Significantly, MUSBACH’s BOA bank account wired \$20,040.00 to MUSBACH’s Coinbase account. MUSBACH’s Coinbase account then transferred 40.64 bitcoins from to the WEBSITE. MUSBACH made several requests to have the 14-year old child Victim murdered and, only after realizing that the murder was not going to happen, requested to cancel the “hit” and sought the return of the \$20,000.00 worth of bitcoins.